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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., and HENDRINA VIVAS
CASTILLO,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**PLAINTIFFS' NOTICE OF ERRATA AND
CORRECTED DECLARATION OF
EMILOU MACLEAN IN SUPPORT OF
PLAINTIFFS' MOTION TO POSTPONE
EFFECTIVE DATE OF AGENCY ACTION**

Assigned to: Hon. Edward M. Chen

Date: March 24, 2025

Time: 9:00 a.m.

Place: Courtroom 5, 17th Floor

Complaint filed: February 19, 2025

1 Additional Counsel for Plaintiffs

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PLEASE TAKE NOTICE that Plaintiffs hereby respectfully attach as Exhibit A the Corrected Declaration of Emilou Maclean in Support of Plaintiffs' Motion to Postpone Effective Date of Agency Action (replaces Dkt. 37), which corrects typographical errors and the following:

- The discussion of Exhibit 6 now includes the correct handle from which Secretary Kristi Noem submitted a particular social media post (@Sec_Noem).
- A quotation mark has been moved in the discussion of Exhibit 7 because President Trump said "[t]hey're" to refer to illegal immigrants.
- The discussion of Exhibit 9 has been corrected to note that President Trump said "Every day, Americans" rather than "[E]veryday Americans" and remove a reference to a statement associated with Exhibit 11.
- The discussion of Exhibit 12 has been updated to reflect the order in which Secretary Noem made certain statements.
- The discussions of Exhibits 13, 14, 15, 23, and 32 have been corrected to include exact quotations (*e.g.*, "we're," not "we are"; "in" a direction rather than "and" a direction), and the discussion of Exhibit 23 reflects that a 2024 review of a state and federal legal database found no "US criminal cases mentioning Tren de Aragua" except "[t]wo recent murders with tenuous links to Tren de Aragua" (which lacked "any apparent connection to gang activities").

Date: March 3, 2025

Respectfully submitted,

ACLU FOUNDATION
OF NORTHERN CALIFORNIA

/s/ Emilou MacLean

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CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2025, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

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/s/ Emilou MacLean
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Michelle (Minju) Y. Cho